

Attachment 

**UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Albert William Bleau Jr.

Plaintiff

Vs.

Civil Action
No. 04 – 10469REK

Bridgewell, Inc. (Greater Lynn Mental Health
& Retardation Association), et al,

Discovery Chronology

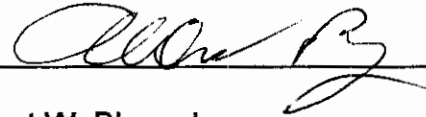
1. November 23, 2006 – Plaintiff's motion to expand discovery
2. December 27, 2006 – Plaintiff's motions for reconsideration of the October 25, 2006 order of the court and for summary judgment.
3. December 27, 2006 – Plaintiff's memorandum supporting his motion for reconsideration of October 25, 2006 order of the court due to discovering new information and in support of his amended motion for summary judgment
4. January 6, 2006 - Meeting between plaintiff and defendant Bridgewell per Rule 26 to develop a joint discovery plan.
5. January 6, 2006 – Plaintiff's motion for an injunction to restrict the sale, pledging and transfer of Bridgewell's assets and to appoint a receiver.
6. January 6, 2006 – Plaintiff's motion to restrict the non profit service of certain individuals.
7. January 6, 2006 - Plaintiff's motion to reestablish the Eastern Massachusetts Housing Corporation (EMHC).
8. January 6, 2006 – Plaintiff's memorandum supporting plaintiff's January 6, 2006 motions.

9. January 10, 2006 – Plaintiff's additional facts and memorandum to support Plaintiff's motions and memorandum of December 27, 2006 and January 6, 2006.
10. January 20, 2006 – Defendant Bridgewell's motion opposing plaintiff's January 6, motions and plaintiff's December 27, 2006 motion for reconsideration.
11. January 30, 2006 – Defendant Bridgewell's correspondence rejecting plaintiff's settlement proposal.
12. January 31, 2006 – Plaintiff's letter to defendant requesting that plaintiff's settlement offer be included in the Joint Discovery Motion.
13. February 2, 2006 – Joint Discovery Plan and plaintiff's proposed settlement filed with the court
14. February 3, 2006 – Defendant's motion to oppose plaintiff's motion for expanded discovery and for a Protective Order.
15. February 7, 2006 – Plaintiff's opposition to defendant's January 20, 2006 motions.
16. February 7, 2006 – Plaintiff's initial disclosures pursuant to Rule 26(a)1
17. February 7, 2006 _ Plaintiff's additional proposals for settlement.
18. February 16, 2006 – Plaintiff's opposition motion to defendant's motion opposing plaintiff's November 23 motion to expand discovery and defendant's motion for a protective order.
19. February 16, 2006 – Plaintiff's Memorandum supporting plaintiff's motion for expanded discovery and opposing defendant's motion to limit and phase discovery.
20. February 22, 2006 – Plaintiff's motion for reconsideration of February 8, 2006 order of the court.
21. March 9, 2006 – Plaintiffs Rule 45 requests for documents from Roderick MacKleish, Robert Griffin, Robert Sherman, Krokidas and Bluestein, LLC, Greenberg and Traurig, LLC, Attorney General Thomas Reilly, and the auditing firm of McGrady and Pullen. No documents were received.
22. March 10, 2006 - Plaintiff's Rule 34 request for documents from Bridgewell, Inc. and to gain access to the premises to copy documents.

23. March 10, 2006 – Plaintiff's submission of Additional Disclosures including basis for plaintiff's claim for settlement, list of individuals and organizations for written questions and depositions and Insurance information.
24. March 10, 2006 – Plaintiff's motion to delay trial for sixty days until December 8, 2006 to allow two additional months for discovery.
25. March 29, 2006 – Plaintiff's motion requesting extension to file an appeal of the February 8, 2006 Order.
27. April 5, 2006 – Defendant Bridgewell's first request for Interrogatories
28. April 11, 2006 – Defendant Bridgewell's first request for documents.
29. May 16, 2006 – District Court Order granting plaintiff's request for an extension to file the appeal of the February 8 and April 6 orders.
30. May 30, 2006 – Plaintiff's appeal of the April 6, February 8 and October 25, 2006 Orders.
32. June 30, 2006 – Plaintiff's response to defendant's Interrogatories and Rule 34 request for documents. The plaintiff did not challenge any requests.
33. July 6, 2006 – Plaintiff's motion for production of documents and for Sanctions
34. July 19, 2006 – District Court Order stopping discovery until the appeal is resolved.
35. September 29, 2006 – Plaintiff's appeal denied
36. November 6, 2006 – Scheduling conference in District Court
36. November 16, 2006 – Plaintiff's letter to defendant requesting a meeting to develop a joint discovery plan.
37. November 17, 2006 – Plaintiff and defendant telephone conference during which defendant refused to develop a joint discovery plan and informed plaintiff that they would file a motion to compel plaintiff's deposition prior to defendant's response to plaintiff's document requests and interrogatories and prior to plaintiff's Rule 45 requests for documents as had been sequenced in the January 6, 2006 Joint Discovery Plan.

Dated: November 29, 2006

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true copy of
the above document was served
upon all counsel of record by First
Class Mail on November 30,
2006.



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